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World Heritage Centre
UNESCO
7, Place de Fontenoy
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16th June 2014

Subject: Request for the inscription of the Slovak part of the UNESCO World Natural Heritage Site “Primeval Beech Forests of the Carpathians and the Ancient Beech Forests of Germany” on the List of World Heritage in Danger.

Dear Madam/Dear Sir,

we, as a Slovak NGO WOLF Forest Protection Movement, hereby requests for the inscription of the Slovak part of the UNESCO World Natural Heritage Site “Primeval Beech Forests of the Carpathians and the Ancient Beech Forests of Germany” (further only PBFC UNESCO property) on the List of World Heritage in Danger.

The reason for our request is a non-fulfilment of obligations of the Slovak Republic resulting from the Convention Concerning the Protection of the World Cultural and Natural Heritage which is valid for the Slovak Republic since its establishment in 1993 as following country after former Czechoslovakia.

The identification, protection and conservation of natural heritage of the PBFC UNESCO in Slovakia, as a basic duty of each State Party to the Convention, are not ensured. **The Slovak Republic declares, to the UNESCO authorities, as well as to the whole world, the non-existing state even 7 years after inscription the sites to the UNESCO World Heritage List.** At the same time, the Slovak Republic continues in systematic destruction of the subject of protection in PBFC UNESCO by logging and supporting projects which result in damaging of the property.

The main reasons for our request are stated in the document “Request for deletion of the Slovak part of the UNESCO World Natural Heritage Site “Primeval Beech Forests of the Carpathians and the Ancient Beech Forests of Germany”” from October 2012 (see Annex II). They can be briefly summarized and updated as follows:

1. During the preparation of nomination project for the Slovak part of PBFC UNESCO property there were no negotiations with owners and users of the area, general public and non-governmental organizations. They had almost no information about the plan to declare these areas, where, why and what it would mean for all interested subjects. **The result is the failure to acknowledge the Slovak part of the PBFC UNESCO by local community. The all relevant stakeholders in the region are against the Slovak part of the PBFC UNESCO property and they have even requested the Council of Europe for withdrawn of the European Diploma in Poloniny National Park.**

2. The Slovak Republic declared to the UNESCO authorities the non-existing state in nomination project. **The territory, which Slovak Republic has designated as a Slovak part of the PBFC UNESCO property has never been protected under the category referred in the nomination project, the IUCN category Ia.**

For example:

- In paragraphs 4. and 6. of the nomination project there is declared that the site Stučica “the area is subject to Ia conservation management regime”, which is not true. The same situation is in the case of site Vihorlat in paragraphs 4. and 10. of the nomination project.
 - None of Slovak sites have management plan, to which the promoters rely on the nomination project in 2005.
 - The information on the page number. 57 of Nomination project „In the Slovak Republic, forests within the nominated properties have forest management plans stipulating **non-intervention policy** according to Legal norms providing for the forest management plans” are not true as well..
 - In article number 5.a there is declared that “Primeval forests of the nominated series, i. e. the stands and the premises on which they grow, are state property of Ukraine and the Slovak Republic”, which is in the case of Slovak republic again not true statement. The designated area includes also the property of private owners and there were no negotiations with them during the nomination process.
 - In article number 5.a there are again non true statements “every nominated property is individually covered by an approved forest management plan (FMP) for a 10-year period, which stipulates non-intervention policy within the nominated primeval forests”.
 - And so on ...
3. The problem is the localization of the area itself. To these days the only available are maps attached to the Nomination project and the borders in these maps do not take into account natural or administrative structuring. These maps are at a scale that does not allow identifying exact boundaries of **UNESCO sites and so they remain unidentified and unmarked on the ground. Problem of ambiguity of borders does not allow protection of Slovak part of the PBFC UNESCO property, because no one knows where exactly these areas are located.**
 4. The low quality of maps is also related to ambiguity of area of the UNESCO sites. After their overlapping in GIS (L’Huillier’s formula) was found that the area of the site Vihorlat, marked in this map, is about 1,173 ha smaller and the area of the site Stučica is about 1,068 ha smaller than the area stated in the obligatory written part of the nomination project. **The Ministry of Environment has found the solution and is trying to reduce area of the Slovak part of the PBFC UNESCO property and to fragmentize the UNESCO sites**, because it is not able to provide what the Slovak Republic declared in the nomination project.
 5. Even after declaration of the UNESCO World Natural Heritage in 2007 the logging, which is planned according to the forest management plans, is practiced without restrictions and also new forest roads are constructed. **The private and governmental enterprises are continuously logging timber and hunting animals in the Slovak part of the PBFC UNESCO property and the amount of planned logging** (which is approximately 14 400 m³ in) **current forest management plan for the site Stučica has increased by 450 % !!!**

- 6. The Governmental organizations and municipalities are planning development activities with negative impact to nature in the UNESCO sites.** For example:
- a) the Ministry of Environment of the Slovak Republic itself agreed with the project of the ski resort “Biele kamene (White stones)” in the UNESCO site Vihorlat after inscribing of these forests in the UNESCO World Heritage List. This project plans permanent deforestation of the part of UNESCO site under the Sninský kameň because of ski runs. Consequently, the project was approved in the ground plans of Zemplínske Hámre village, Snina town and Prešov self-governing region.
 - b) Furthermore, in the UNESCO site Stužica the group of representatives of local self-administrations prepares the construction of a new border crossing and automobile road to Poland. This vision was almost approved in the ground plan of Prešov self-governing region and, nowadays, it is shown in approved ground plan of Stakčín village. This allows further destroying of UNESCO forests.
- 7.** The problem is also reversal of particular state policies and diametric divergences of opinion of particular state departments in Slovak Republic. Organizations which administrates state forests (the state enterprise Forests of the Slovak Republic, Military Forests and Estates of the Slovak Republic and state enterprise Forest-Agricultural Estate Ulič) in principle do not agree with the establishment of the Slovak part of the PBFC UNESCO as protected areas and continue logging in these forests.
- 8.** From nature protection point of view, it is important that **in the parts of UNESCO sites, the hunting is practiced without whatever protective restrictions also after declaration of the UNESCO World Natural Heritage in 2007.** The localities are part of state as well as private hunting-grounds, new hunting facilities are built there and hunters organize hunts.

Since 2008 we have informed and warned all relevant stakeholders and institutions (the public, the State Nature Conservancy of the Slovak Republic, owners and users of the land, District Forest Offices, MoE of the Slovak Republic, MoFA of the Slovak Republic, Slovak Committee for UNESCO, World Heritage Centre and other interested subjects), see Appendix III, about prepared or actually direct destroying of the PBFC UNESCO. There are no results or undertaken activities.

Therefore in term of above stated facts we require inscription of the Slovak part of the UNESCO World Natural Heritage Site “Primeval Beech Forests of the Carpathians and the Ancient Beech Forests of Germany” (PBFC UNESCO) in to the The List of World Heritage in Danger. According to our opinion, the paragraphs 177, 178 and 180 of the Operational Guidelines for the Implementation of the World Heritage Convention (OG WHC) were fulfilled.

Yours sincerely,

Viliam Bartuš
WOLF Forest Protection Movement
Head of the tribe
Eastern Carpathians Mountains